

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

<b>RAYMOND W. SHADEL,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 4:20-CV-00904-SRB</b>
	)	
<b>BIG LOTS STORES, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**MOTION TO REMAND AND FOR FEES PURSUANT TO 28 U.S.C. § 1447(c)**

COMES NOW Plaintiff Raymond W. Shadel, by and through under signed counsel, and hereby moves this Court for an Order pursuant to 28 U.S.C. § 1447(c), remanding this case to the Circuit Court of Jackson County, Missouri at Independence, for the reasons set out in Plaintiff's contemporaneously filed Memorandum of Law.

Plaintiff also requests an award of fees and costs pursuant to 28 U.S.C. § 1447, because Defendant lacked an objectively reasonable basis for seeking removal of this action, as set out more fully in Plaintiff's contemporaneously filed Memorandum of Law.

Date: December 1, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via the Court's electronic filing system to the following:

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